



BLUETRITON™

900 LONG RIDGE ROAD, BLDG 2
STAMFORD, CT 06902-1138



TO: Environment Committee

FROM: Liz Donohue, BlueTriton Brands



DATE: FEBRUARY 27, 2023

SUBJECT: HB 6664 AN ACT MANAGING WASTE AND CREATING A WASTE AUTHORITY



Senator Lopes, Representative Gresko, Senator Harding, Representative Callahan, and honorable members of the Environment Committee. My name is Liz Donohue and I am the Director of Government Relations of BlueTriton Brands headquartered in Stamford, Connecticut. In addition we have a home and office delivery branch Ready Refresh in North Haven. Together there are approximately 300 BlueTriton employees in Connecticut.



BlueTriton is an industry leader in packaging sustainability, and we welcome this opportunity to testify on HB 6664, specifically Section 2. We have led our industry in source reduction initiatives, designing for recyclability, consumer education, and material innovations, which includes the use of recycled content and increasing our refillable portfolio. We are committed to reducing our waste footprint, keeping plastic out of landfills and the environment. In 2022, approximately 24% of our portfolio was made from recycled plastic. This winter BlueTriton is rolling out 100% recyclable 700mL and 1L bottles across our portfolio nationwide – not an easy feat given the high demand for recycled plastic outside of the circular economy this legislation seeks to foster.



Establishing a recycled content standard that is regionally aligned will influence end market use so that more food-grade recycled content is recycled back into food-grade applications. Too many recovered beverage containers are being down-cycled and used in non-food contact applications. While giving a plastic beverage container another life in products such as carpets and textiles ensures one more use, it does not represent circularity and the highest and best use of beverage-grade recycled material.



The policy behind the Section 2 of HB 6664 can help significantly in fostering a circular economy; however, it needs to be drafted thoughtfully with an understanding of the regional recycled materials market. While recycled content standards will solidify and stabilize demand for recycled content and thus generate investments to increase regional supply, we have learned from our efforts in other states that there are best practices that would benefit Connecticut's participation in the effort to create a circular economy for plastic.



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Since beverage containers are regionally distributed, it is important that any legislation promotes regional harmonization. To do so, we recommend the following:



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- Enable regional infrastructure investment and collection to scale by aligning the recycled content to harmonize with nearby states' requirements (ME & NJ).
- Clarify the averaging language. As currently written, the language implies that each individual container sold must comply with the recycled content standard – this is impractical and inconsistent with other states' standards.
- For the purpose of measuring a container's recycled content, caps, closures, and labels should be excluded.
- After experiencing the unanticipated impacts to the market (pandemic, oil shocks, etc.), a variance process should be included to enable producers to petition the state to consider broad-based factors for a given material/year, and a waiver process for individual producers who may face unique circumstances with compliance such as interruptions of their individual supply chains, damage to facilities, lost contracts, etc.
- Lastly, third party certification requirements can be very helpful in the sustainability space. Unfortunately, with regard to recycled plastic there are no widely recognized entities providing this certification and thus, this requirement should not be included in final language.

We are eager to work with Connecticut to craft language for HB 6664 to enable the circular economy, and look forward to continuing our work in support of regional recycled content standards.